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FILED

THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JUN 23 2008 *aw*
6-23-2008
MICHAEL W. BISHOP
CLERK, U.S. DISTRICT COURT

RODNEY C. BEW;
Movant/Defendant;

v.

Criminal Case No. 1:08-cv-1241

THE UNITED STATES OF AMERICA;
Respondent/Plaintiff;

Motion To Petition For A Further Downward Departure
Pursuant To 28 U.S.C. § 3582 Sentencing Correction

Comes now Movant/Defendant, Rodney Bew, Federal No. 16835-424, to heartfully petition this honourable court Justice to consider a further departure based on Movant's eligibility for the Sentencing Commission's recent Sentencing Guidelines Amendment, Amendment 706.

Movant has already been prosecutorially recommended for the (2) two point reduction relevant to Amendment 706; but Movant prayfully moves this court to consider his post-conviction rehabilitation during his incarceration. Movant understands that it is this court's purview to additionally depart pursuant to the post-Booker era. Movant has, and continues to be, diligent and sincere in his heartfelt goal to display a person far removed from the person who was sentenced in Your Honour's courtroom.

Movant has been following Bureau Policy rules and regulations, and has already satisfactorily completed, or is satisfactorily completing many self-improvement classes for inmate betterment. Movant has reliably shown himself to be the 'model' inmate. Movant is sending, as evidence, exhibits labeled, evidencing Movant's

certificates.

Additionally; since the guidelines are now advisory; a justice has control over advisory guidelines and can grant a further downward departure, if it is decided as appropriate.

Movant prayfully petitions Your Honour to consider this Movant's actions at self-improvement to become a better person and grant a further downward departure to hopefully allow this Movant the opportunity to be able to continue to self-improve, and utilize his acquired skills to make him a responsible, productive citizen and a credit to his community upon his release from custody.

Movant graciously presents information about the visual dedication to bettering himself; for himself and for family and the community-at-large. Included is a group of certificates awarded for successful completion of these classes.

Since Movant has been incarcerated he has been active in various institution programs that are offered by the Federal Bureau of Prisons to inmates desiring to change their behavior and allow their lifestyle to be a visible testament to the productive and positive influence that will benefit society-at-large.

Movant has completed the following programs; Adult Childhood Development, Parenting Skills, H.I.V. & A.I.D.S. Awareness, Legal Research Class, Entrepreneurship, and the (40) hour Choice & Change Drug Abuse Education Program that was an order of the court. Currently, Movant is employed at the Federal Prison's U.N.I.C.O.R..

Additionally; Movant is taking other programs such as exercise and health programs, Core Training and Spin Cycling. Movant is, likewise, enrolled to participate in the upcoming classes of Positive Thinking Course, Anger Management Class, and Victim Impact Class.

Movant is, also, preparing for suitable work when he is released. Movant wants to redevelop a Trucking Transportation Company. He has knowledge in this field and with the "Second Chance Bill" passing and being instituted, Movant has the

additional ability to seek and receive a 'hand up' to better the community and become a positive 'role-model' instead of a drain on the economy.

Movant does not have to inform this court that it is 'so' easy to 'say something' just say anything to get something wanted. But what this Movant would prayfully alert this court to is that he is so tired of 'doing what he always did, and getting what he always got'. Movant all too clearly understands that it is 'he' who must change, to get a change. This he has done, and continues to strive to do better every day.

Movant has been a less than 'model citizen' in the past, but, Your Honour, Movant has been productive and a positive citizen some. Movant has his G.E.D. from the State of Mississippi. He has graduated from Jones Junior College and received a (2) year Certificate. Movant was co-owner in a Jani King with another individual in 1998, and part owner of R & R Trucking in 2002. Movant, additionally, went to Sun Praire Heavy Equipment & Truck Driving School obtaining his C.D.L. endorsements.

Your Honour, that does not even speak to the pain I have caused to my family and friends. Movant married Tiffany D. Bew in 2002. Movant also has (1) daughter of the age of (7); Montiana Ahmiee Bew. Movant's parents are deceased. Movant has sorely missed his wife and daughter, and they certainly did not deserve what they have had to endure due to my incarceration. I want to change the future of that.

Additionally, Your Honour, Movant has become aware, and is deeply concerned about the well being of his daughter, Montiana. Montiana's mother, Molonda Holman, has developed a chemical dependancy on cocaine and ecstasy. Drug abuse certainly affects children and the need for good, moral child-rearing.

In 2003, Movant filed a motion with the Will County Courthouse in Joillet, Illinois seeking full custody of his daughter, Montiana Ahmiee Bew. Such was,

and still is, to effect parental help for Montiana. Movant will, upon release, continue to pursue full parental custody of his daughter. A further downward departure would greatly benefit father and daughter both.

Pursuant to the post-Booker era, Movant prayerfully moves this court to heartfully consider Movant's character improvements and grant him a further downward departure. Movant is ready, and has been, to have the courts allow him the opportunity to prove that none of this 'character improvement' is temporary. Movant is a 'model' inmate and he will be a 'model' citizen. Obviously, this will benefit the Movant, but it will benefit my daughter, the community, and our nation as a whole. This certainly includes the Federal Bureau of Prisons, the United States Courts, and the Government.

In summation, Movant prays for this court to study, consider, and prayerfully decide to grant Movant such extra relief as Your Honour deems fit.

Movant sincerely thanks this court and all its' staff for all your time and energy given regarding this matter.

Respectfully Submitting;

Rodney Bew



Dated:

6-16-2008

ATLWD *
PAGE 001 OF 001 *

INMATE EDUCATION DATA
TRANSCRIPT

* 03-20-2008
* 12:55:45

REGISTER NO: 16835-424
FORMAT.....: TRANSCRIPT

NAME...: BEW
RSP OF: ATL-ATLANTA USP

FUNC: PRT

----- EDUCATION INFORMATION -----

FAC	ASSIGNMENT	DESCRIPTION	START DATE/TIME	STOP DATE/TIME
ATL	ESL HAS	ENGLISH PROFICIENT	12-29-2006 0001	CURRENT
ATL	GED HAS	COMPLETED GED OR HS DIPLOMA	12-22-2006 1357	CURRENT

----- EDUCATION COURSES -----

SUB-FAC	DESCRIPTION	START DATE	STOP DATE	EVNT	AC	LV	HRS
ATL	ADULT/CHILDHOOD DEV T-W 12-3PM	01-14-2008	02-26-2008	P	C	P	54
ATL	RPP6 PARENTING SKILLS	01-14-2008	01-18-2008	P	C	P	4
WIL	RPP #1 HIV/AIDS AWARENESS	01-05-2007	01-05-2007	P	C	P	1
CCC M	LEGAL RESEARCH CLASS	06-15-2005	07-23-2005	P	W	I	10

G0000 TRANSACTION SUCCESSFULLY COMPLETED

Certificate of Completion

Bureau of Prisons

USP-Atlanta, Georgia

This certifies that

Rodney Bew 16835-424

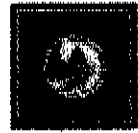
has satisfactorily completed the course

CHOICE AND CHANGE

(40-HOUR DRUG ABUSE EDUCATION)

and is hereby awarded this certificate on this 20th day of March 2008

G. Daniel
Daniel, B.A., Drug Treatment Specialist



Dr. S. Pinnix-Hall

Dr. S. Pinnix-Hall, Acting Chief of Psychology

CERTIFICATE OF ACHIEVEMENT

METROPOLITAN CORRECTIONAL CENTER, CHICAGO, ILLINOIS

This certifies that

RODNEY BEW

has satisfactorily completed

ENTREPRENEURSHIP

This certificate is hereby issued this 16TH Day of MAY 2007



Education Program Manager

Certificate of Completion

FCI-Atlanta, Georgia

This certifies that

Rodney Bew

Has participated in the 8 week program of Spinning. Thank you for an Outstanding Job.

Spinning Class

and is hereby awarded this certificate on this tenth day of June 2008

W. Foreman

W. Foreman; Recreation Department

Certificate of Completion

FCI-Atlanta, Georgia

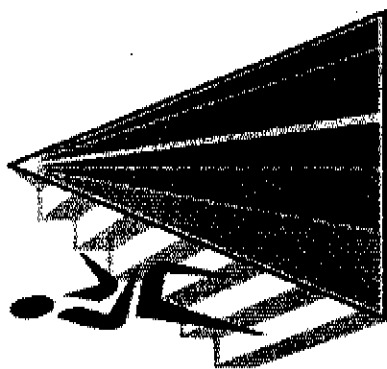
This certifies that

Rodney Bew

has successfully completed the 8 weeks Wellness Program, in which he obtained knowledge to assist with leading a more healthier lifestyle

"Core Training"

(Understanding the value of exercising and the state of being in good health)



and is hereby awarded this certificate on this tenth day of June 2008

W. Foreman

W. Foreman; Recreation Department